THE HONORABLE JAMAL N. WHITEHEAD 1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 PLAINTIFF PACITO; PLAINTIFF ESTHER; Case No. C25-255 JNW 9 PLAINTIFF JOSEPHINE; PLAINTIFF SARA; PLAINTIFFS' UNOPPOSED PLAINTIFF ALYAS; PLAINTIFF MARCOS; 10 MOTION TO FILE OVER-PLAINTIFF AHMED; PLAINTIFF RACHEL; 11 LENGTH MOTION FOR PLAINTIFF ALI; HIAS, INC.; CHURCH PRELIMINARY INJUNCTION WORLD SERVICE, INC.; and LUTHERAN 12 COMMUNITY SERVICES NORTHWEST, NOTE ON MOTION CALENDAR: 13 FEBRUARY 11, 2025 Plaintiffs, 14 v. 15 DONALD J. TRUMP, in his official capacity as 16 President of the United States; MARCO RUBIO, in his official capacity as Secretary of State; 17 KRISTI NOEM, in her official capacity as Secretary of Homeland Security; DOROTHY A. 18 FINK, in her official capacity as Acting Secretary of Health and Human Services, 19 20 Defendants. 21 Pursuant to Local Rules W.D. Wash. LCR 7(f), Plaintiffs respectfully request leave to file 22 a motion for preliminary injunction not to exceed 10,000 words. The default limit for such motions 23 under LCR 7(e)(3) is 8,400 words. Defendants do not oppose this request. 24 Good cause exists to support Plaintiffs' request. Plaintiffs seek a preliminary injunction 25 blocking the enforcement of Executive Order 14163, titled "Realigning the United States Refugee 26

PLS.' MOT. TO FILE OVER-LENGTH MOT. FOR PRELIM. INJ. (No. C25-255 JNW)

Perkins Coie LLP 1201 Third Avenue, Suite 4900 Seattle, Washington 98101-3099 Phone: +1.206.359.8000 Fax: +1.206.359.9000

Admissions Program" (the "Refugee Ban EO"), and the Defendants' suspension of refugee application processing and admissions and funding to refugee resettlement partners. The Refugee Ban EO and its implementation by Defendants violate the Immigration and Nationality Act, the Administrative Procedure Act, and the U.S. Constitution and impose devastating consequences not only on Plaintiffs, but on organizations across the country and hundreds of thousands of refugees worldwide. Due to the importance and complexity of this matter, an over-length motion is required for Plaintiffs to adequately address the relevant legal landscape of refugee settlement, the myriad legal infirmities of the Refugee Ban EO and its implementation, and the irreparable harm inflicted on Plaintiffs. Accordingly, Plaintiffs request leave to file a motion for preliminary injunction with an additional 1,600 words, for a total not to exceed 10,000 words, including footnotes. This request serves the ends of justice and will not result in prejudice to Defendants. The undersigned certifies that this motion contains 219 words, in compliance with the Local Civil Rules.

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1	Dated: February 11, 2025	By: s/ Harry H. Schneider, Jr.
	•	Harry H. Schneider, Jr., WSBA No. 9404
2	Deepa Alagesan*	Jonathan P. Hawley, WSBA No. 56297
3	Mevlüde Akay Alp* Linda Evarts*	Shireen Lankarani, WSBA No. 61792
	Ghita Schwarz*	Esmé L. Aston, WSBA No. 62545 PERKINS COIE LLP
4	INTERNATIONAL REFUGEE	1201 Third Avenue, Suite 4900
5	ASSISTANCE PROJECT	Seattle, Washington 98101
	One Battery Park Plaza, 33rd Floor	Telephone: (206) 359-8000
6	New York, New York 10004	Facsimile: (206) 359-9000
7	Telephone: (646) 939-9169	HSchneider@perkinscoie.com
	Facsimile: (516) 324-2267	JHawley@perkinscoie.com
8	dalagesan@refugeerights.org	SLankarani@perkinscoie.com
9	makayalp@refugeerights.org levarts@refugeerights.org	EAston@perkinscoie.com
	gschwarz@refugeerights.org	John M. Devaney [†]
10		PERKINS COIE LLP
11	Melissa Keaney* INTERNATIONAL REFUGEE	700 Thirteenth Street NW, Suite 800
	ASSISTANCE PROJECT	Washington, D.C. 20005 Telephone: (202) 654-6200
12	P.O. Box 2291	Facsimile: (202) 654-6211
13	Fair Oaks, California 95628	JDevaney@perkinscoie.com
	Telephone: (646) 939-9169	Joel W. Nomkin*
14	mkeaney@refugeerights.org	PERKINS COIE LLP
15		2525 East Camelback Road, Suite 500
		Phoenix, Arizona 85016
16		Telephone: (602) 351-8000
17		Facsimile: (602) 648-7000
1 /		JNomkin@perkinscoie.com
18		Nicholas J. Surprise [†]
19		PERKINS COIE LLP
19		33 East Main Street, Suite 201
20		Madison, Wisconsin 53703
,		Telephone: (608) 663-7460 Facsimile: (608) 663-7499
21		NSurprise@perkinscoie.com
22		
		Counsel for Plaintiffs
23		* Admitted pro hac vice
24		† Pro hac vice forthcoming
25		
26		

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CERTIFICATE OF SERVICE 1 I certify under penalty of perjury that on February 11, 2025, I caused to be electronically 2 3 filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send a notification of the filing to the email addresses indicated on the Court's Electronic Mail 4 5 Notice List. Dated: February 11, 2025 6 7 s/ Harry H. Schneider, Jr. Harry H. Schneider, Jr. 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26

CERTIFICATE OF SERVICE (No. C25-255 JNW)

Perkins Coie LLP 1201 Third Avenue, Suite 4900 Seattle, Washington 98101-3099 Phone: +1.206.359.8000 Fax: +1.206.359.9000